## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 17-70314-JAD

Hilda A. Natta : Chapter 13

: Judge Jeffery A. Deller

**Debtor(s)** : \*\*\*\*\*\*\*\*\*\*\*\*\*\*

:

Wells Fargo Bank, N.A. : Date and Time of Hearing

**Movant,**: Place of Hearing

vs : November 2, 2018 at 10:00 a.m.

;

Hilda A. Natta : Courtroom B, First Floor Joseph Natta, Jr. : Penn Traffic Building,

: 319 Washington Street,

Ronda J. Winnecour : Johnstown, PA 15901

Respondents.

# NOTICE OF HEARING AND RESPONSE DEADLINE WITH 30 DAY WAIVER REGARDING MOTION OF WELLS FARGO BANK, N.A. FOR RELIEF FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY

#### TO THE RESPONDENT(S):

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than September 22, 2018 (i.e., seventeen (17) days after the date of service below), in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the Court's webpage at <a href="www.pawb.uscourts.gov">www.pawb.uscourts.gov</a>. If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled. The Movant hereby waives the right under 11 U.S.C. § 362(e) to a hearing on this motion within thirty (30) days of the date it is filed.

You should take this Notice and the Motion to a lawyer at once.

A hearing will be held on November 2, 2018 at 10:00 a.m. before Judge Jeffery A. Deller in Courtroom B, Penn Traffic Building, First Floor, 319 Washington Street, Johnstown, PA 15901. Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Date of Service: September 5, 2018

#### /s/ Karina Velter

Karina Velter, Esquire (94781) Kimberly A. Bonner (89705) Adam B. Hall (323867) Sarah E. Barngrover (323972) Edward H. Cahill (0088985) Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

Telephone: 614-220-5611 Fax: 614-627-8181 Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com

#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

VS

: Case No.: 17-70314-JAD

Hilda A. Natta : Chapter 13

Judge Jeffery A. Deller

**Debtor(s)**:

Wells Fargo Bank, N.A. : Date and Time of Hearing

> : Place of Hearing Movant,

November 2, 2018 at 10:00 a.m.

: Courtroom B, First Floor Hilda A. Natta : Penn Traffic Building, Joseph Natta, Jr.

: 319 Washington Street,

**:** Johnstown, PA 15901 Ronda J. Winnecour

Respondents.

#### CERTIFICATE OF SERVICE OF RESPONSE DEADLINE, WITH 30 DAY WAIVER AND HEARING DATE AND MOTION FOR RELIEF FROM CO-DEBTOR STAY

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on (date) September 5, 2018

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: \_\_first-class mail and/or electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON.	September 5, 2018	
	<del></del>	By:/s/ Karina Velter
		Signature
		Karina Velter, Esquire
		Typed Name
		P.O. Box 165028, Columbus, OH 43216-5028
		Address
		<u>614-220-5611</u>
		Phone No.
		94781
		List Bar LD and State of Admission

EVECTITED ON:

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Karina Velter, Attorney for Creditor, Manley Deas Kochalski LLC, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of the United States Trustee, Liberty Center, 1001 Liberty Avenue, Suite 970, Pittsburgh, PA 15222 (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee, Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219 (notified by ecf)

Kenneth P. Seitz, Attorney for Debtor, P.O. Box 211, Ligonier, PA 15658 (notified by ecf)

Hilda A. NattaDebtor, 776 E. Oakmont Boulevard, Johnstown, PA 15904 (notified by regular US Mail)

Hilda A. Natta and Joseph Natta, Jr., Debtor, 414 Nees Avenue, Johnstown, PA 15904-1224 (notified by regular US Mail)